

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Nancy Goodman, *et al.*,

Plaintiffs,

v.

J.P. Morgan Investment Management, Inc., *et al.*,

Defendants.

Civil No. 2:14-CV-414

Chief Judge Sargus

Magistrate Judge Jolson

Campbell Family Trust, *et al.*,

Plaintiffs,

v.

J.P. Morgan Investment Management, Inc., *et al.*,

Defendants.

Civil No. 2:15-CV-2923

Chief Judge Sargus

Magistrate Judge Jolson

**JOINT STIPULATION**

WHEREAS, on August 29, 2014, Defendants served their Initial Disclosure Statement in *Nancy Goodman and Jacqueline Peiffer v. J.P. Morgan Investment Management, Inc.*, File No. 2:14-cv-00414 (S.D. Ohio);

WHEREAS, on January 8, 2016, Defendants served their Initial Disclosure Statement in *Campbell Family Trust v. J.P. Morgan Investment Management, Inc., et. al.*, File No. 2:15-CV-2923 (S.D. Ohio);

WHEREAS, in those Initial Disclosures Statements, Defendants provided a list of individuals that Defendants identified as likely to have discoverable information that Defendants may use in support of their defenses;

WHEREAS, Defendants responded to Plaintiffs' interrogatories on October 8, 2015, February 22, 2016, April 8, 2016 and May 12, 2016. In those responses, Defendants identified certain individuals who have relevant information about this litigation;

WHEREAS, on September 2, 2016, the Court extended the deadline to complete fact discovery to May 4, 2017;

WHEREAS, Plaintiffs proposed not to take the depositions of Defendants' employees Lawrence E. Playford, Gloria H. Fu, and Laura Del Prato if Defendants agreed that Defendants would not rely on these individuals' testimony at trial or in support of a dispositive motion without first making the relevant individual available for deposition, and Defendants agreed;

WHEREAS, the parties also agree that in the event Defendants rely on testimony provided by Defendants' employees Lawrence E. Playford, Gloria H. Fu, and/or Laura Del Prato in support of their defense of this litigation, either in a dispositive motion or at trial, Plaintiffs have not waived any rights and may take their depositions at that time;

THEREFORE, the Parties, by their undersigned attorneys, subject to the approval of the Court, HEREBY STIPULATE AND AGREE that in the event Defendants rely on testimony provided by Defendants' employees Lawrence E. Playford, Gloria H. Fu, and/or Laura Del Prato in support of their defense of this litigation either in a dispositive motion or at trial, Plaintiffs may take the deposition(s) at that time of whichever of these individuals' testimony is offered.

Dated: May 25, 2017

**MEYER WILSON CO., LPA**

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IT IS SO ORDERED,

Dated: May 26th, 2017

  
Edmund A. Sargus, Jr.  
Chief United States District Judge